

**EXHIBIT DDD**



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CLIENT/MATTER NUMBER  
085437-3088

November 9, 2007

**VIA FACSIMILE AND U.S. MAIL**

Bruce W. ("Rusty") Smith  
"Trustee"  
SEIU, Local 715  
2302 Zanker Road  
San Jose, CA 95131-1115

**Re: Stanford Hospital & Clinics/Lucile Packard Children's Hospital  
(Services of Weinberg, Roger & Rosenfeld)**

Dear Mr. Smith:

On June 14, 2007, you wrote to Laurie Quintel to advise that you had been appointed as "trustee" of "SEIU, Local 715" pursuant to the International President's "emergency powers." In that same letter, you indicated that it was your intention that all service agreements entered into by SEIU, Local 715 with other locals remain in full force and effect without change whatsoever, and informed Ms. Quintel that certain employees of SEIU-UHW were considered by you to be the representatives responsible for Stanford Hospital & Clinics and Lucile Packard Children's Hospital (the "Hospitals"). By letter dated August 1, 2007, Ms. Quintel responded to your letter informing you that the Hospitals had previously rejected the purported service agreement between SEIU, Local 715 and SEIU-UHW, and your appointment as "trustee" did not affect that rejection.

Shortly after your correspondence to Ms. Quintel, I learned that Barbara Chisholm of Altshuler Berzon LLP was representing SEIU Local 715, and later confirmed that fact in a telephone conversation with her, in which she stated that she had been retained by you, and thus represented Local 715. I confirmed her representations by letter to Ms. Chisholm. In that same letter, I confirmed her direction to send all future correspondence regarding Local 715 to her. Since that date, I have received no notification from any source that she no longer represents Local 715, and I have continued to correspond with her as she directed.

Subsequent to confirming that she represents you and the Local, neither she nor her colleagues in Altshuler Berzon have made an appearance in any arbitration, nor has she been involved in any matters relating to the representation of the bargaining unit at the Hospitals. Rather,

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November 9, 2007

Page 2

all appearances by legal counsel have been by, and all correspondence from legal counsel has come from, attorneys with the firm of Weinberg, Roger & Rosenfeld.

One of the provisions of the service agreement which you have attempted to reaffirm, but which was rejected by the Hospitals, calls for SEIU-UHW to provide professional services in the grievance process and at arbitration hearings, at no cost to SEIU, Local 715. Weinberg, Roger & Rosenfeld represents SEIU-UHW.

As you no doubt know, the Hospitals have serious doubts concerning the status and ongoing existence of SEIU, Local 715, and the legitimacy of your "appointment" as trustee of that purported entity.

Despite those concerns, in view of the fact that the Hospitals have rejected the service agreement between SEIU, Local 715 and SEIU-UHW, and in view of the fact that they have been advised that Altshuler Berzon LLP has been retained to represent SEIU, Local 715, I wrote to Ms. Chisholm, repeatedly, requesting information concerning whether the firm of Weinberg, Roger & Rosenfeld was representing SEIU, Local 715 by virtue of being retained directly by you, or whether it was providing its services on behalf of SEIU-UHW, pursuant to the purported service agreement between that entity and SEIU, Local 715 which you have attempted to unequivocally reaffirm in its entirety and without change. Ms. Chisholm has apparently declined to respond to my inquiries and requests for information. On the chance that she has not forwarded my requests to you, I now make the same request of you, so that the Hospitals might determine the appropriate response.

Please advise whether the firm of Weinberg, Roger & Rosenfeld has been retained directly by you to represent SEIU, Local 715, or whether it is performing service on behalf of SEIU-UHW pursuant to the service agreement which you have reaffirmed, and which provides that SEIU-UHW will provide such services to SEIU, Local 715, at no charge.

As this is simple request, your prompt reply is anticipated and will be appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurence R. Arnold', with a long, sweeping flourish extending from the end of the signature.

Laurence R. Arnold

LRA:sey

cc: Laurie Quintel

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<b>TO:</b>	<b>PHONE #:</b>	<b>FAX #:</b>
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**From :** Laurence R. Arnold  
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**Sender's Direct Dial :** 415.984.9819  
**Date :** November 9, 2007  
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